

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS	§	
INTERNATIONAL LIMITED, ARRIS	§	
GLOBAL LTD., ARRIS US HOLDINGS,	§	Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§	(Lead Case)
TECHNOLOGY, INC., and ARRIS	§	
ENTERPRISES, LLC,	§	
	§	
NOKIA CORP., NOKIA SOLUTIONS	§	
AND NETWORKS OY, and NOKIA OF	§	Civil Action No. 2:21-cv-309-JRG
AMERICA CORP.	§	(Member Case)
	§	
Defendants.	§	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to the Court’s Order (Dkt. 27), dated October 25, 2021, Plaintiff TQ Delta, LLC and Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (the “CommScope Defendants”) and Defendants Nokia of America Corp., Nokia Corp. and Nokia Solutions and Networks Oy (the “Nokia Defendants”) jointly and respectfully move for entry of the parties’ Agreed Protective Order attached hereto.

Dated: December 9, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing *via* electronic mail to all counsel of record.

/s/ William E. Davis, III

William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the foregoing motion is joined in its entirety by Plaintiff TQ Delta, LLC and the Nokia Defendants and the CommScope Defendants.

/s/ William E. Davis, III

William E. Davis, III